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*Attorneys for Defendant
NETFLIX, INC.*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

LAURI VALJAKKA,

Plaintiff,

v.

NETFLIX, INC.,

Defendant.

Case No.: 4:22-cv-01490-JST

**DECLARATION OF RACHAEL D.
LAMKIN ISO**

Judge: Hon. Jon S. Tigar

I, Rachael D. Lamkin, declare as follows:

1. I am a partner with the law firm of Baker Botts L.L.P. and counsel of record for Defendant Netflix, Inc. in the above-captioned matter.

2. I am admitted to practice in all state and federal courts in California, federal courts in Colorado and the Eastern and Western Districts of Texas. I am also admitted in the Federal Circuit, the International Trade Commission, the Court of International Trade, and this Honorable Court.

3. I have personal knowledge of the facts stated herein.

4. Attached as Exhibits A and B are AiPi's Motion To Quash and Netflix's Opposition to same, filed in the Eastern District of Virginia.

5. On September 20, 2024, I boarded a flight from San Francisco to Washington D.C., prepared to attend and argue AiPi's Motion To Quash. With about an hour left on the flight, the Captain announced that we would be making an emergency landing in Chicago because of a "hydraulics issue". The stewardess told me that Chicago had a longer runway, which we needed given the issue. Once we emergency-landed in Chicago, I was unable to get a flight to Washington D.C. because of a very large storm in said city.

6. Attached as Exhibit C is a true and correct copy of Netflix's narrowed subpoena, served upon AiPi via electronic mail to AiPi's counsel per agreement between the Parties.

7. On September 4, 2024, I emailed Lauri Valjakka and asked if he would oppose a motion to extend the trial dates. Mr. Valjakka said he does not oppose and that he would stipulate to an extension.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on this Ninth day of September, 2024 in New York City, New York.

By: /s/ Rachael D. Lamkin
Rachael D. Lamkin